

Table 1. Comments from the Federal Economic Development Agency (FedNor) on the draft Impact Assessment Report and Potential Conditions for the Crawford Nickel Project (the project)

Relevant section of the draft Impact Assessment Report or Potential Conditions	Description of Key Issue (Context and Rationale)	Solutions	Plain language summary for inclusion in Summary of Issues
4.2.3 Effects on the health, social, and economic conditions of Indigenous Peoples “The project is expected to bring in outside workers, increasing demand for local services and infrastructure and reducing their availability and affordability, including housing and temporary accommodations, utilities, health and emergency services, education and childcare, and transportation. Given that there are no on-site accommodations proposed, workers are expected to reside in nearby urban centres, with some possibility of fly-in and fly-out workers.	The project is expected to create demand for workforce accommodation during construction and operations. Many nearby Indigenous and non-Indigenous communities already face housing challenges, including limited housing availability, affordability concerns, overcrowding, and constraints on new housing development. While the proposed Accommodation Plan would require the proponent to assess workforce housing needs and cooperate with Indigenous communities and municipalities, the current approach appears to focus primarily on planning and consultation processes. It does not clearly demonstrate how sufficient housing capacity will be available before project-related workforce demand occurs, nor does it establish measurable outcomes related to	a) FedNor recommends the inclusion of condition 5.6—Accommodation Plan—in the final Impact Assessment Report. b) Given existing housing pressures in many northern and rural communities, the Accommodation Plan for housing could demonstrate how adequate housing capacity is expected to be available to accommodate project-related workforce demands. This assessment should be developed in collaboration with Indigenous communities and municipal, provincial, and federal governments, as appropriate. Such an approach would support broader housing availability, affordability, and community well-being objectives while helping to reduce potential pressures on local housing markets. c) The Accommodation Plan could also identify opportunities to leverage existing housing and housing-enabling infrastructure programs, including federal, provincial, Indigenous, and municipal funding programs, to support community housing priorities and accommodate project-related growth in a manner consistent with broader government housing objectives. Such measure would reduce uncertainty in whether implementation of municipal initiatives would coincide with the project’s labour demand	a) FedNor recommends the inclusion of the Accommodation Plan as a condition in the final Impact Assessment Report. b) The project could increase demand for housing in nearby communities. The Accommodation Plan could explain how housing needs for project workers will be met without making it harder for local residents to find affordable housing. Working with Indigenous communities and governments can help ensure housing needs are planned for before workforce demand increases. c) The Accommodation Plan could also identify available funding programs that could support housing and infrastructure needs associated with project growth, helping communities prepare for increased workforce demand and reducing pressure on housing and local services.

IAAC recommends that the proponent implement an Accommodation Plan to coordinate with municipalities on housing plans and initiatives and conduct an accommodations study to identify additional measures to address housing needs. IAAC recognizes some uncertainty in whether implementation of municipal initiatives would coincide with the project's labour demand timelines to balance the immediate increase in competition for services."	housing availability and affordability. Without adequate housing planning and investment, project-related workforce demand could place additional pressure on local housing markets, potentially affecting the ability of community members to access affordable and suitable housing. Given existing government priorities and investments aimed at increasing housing supply and improving housing affordability, there is an opportunity for the project to align with these objectives and support sustainable community growth.	timelines to balance the immediate increase in competition for services. d) The Build Communities Strong Fund (BCSF) is a recently announced national funding opportunity led by Housing and Infrastructure Canada. This program could offer support to Timmins and surrounding municipalities to access funding for infrastructure projects that could help mitigate some of the project's adverse effects on housing. The fund has three streams that offer a wide array of infrastructure supports such housing related infrastructure and community infrastructure. Provinces and territories will deliver the Community Stream, which allows local communities to make strategic investments in essential infrastructure, such as roads and bridges, public transit, and housing-related infrastructure (e.g. wastewater, drinking water, solid waste management). FedNor will deliver the Local Impact Stream and will support shovel ready community infrastructure projects—from community buildings and recreation facilities to innovation hubs and cultural spaces—led by Indigenous communities and organizations, municipalities and municipal organizations, and not-for-profit organizations, helping communities create the conditions necessary for economic growth and development. This stream does not support housing-related infrastructure. e) FedNor recommends adding "and housing" to the following sentence to account for uncertainties	d) The Build Communities Strong Fund may provide opportunities to support local infrastructure and housing-related needs associated with project growth, helping communities manage potential housing pressures and accommodate increased workforce demand. e) FedNor recommends adding "and housing" to the following sentence to account for uncertainties in implementation of municipal initiatives extending to housing: "IAAC recognizes some uncertainty in whether implementation of municipal initiatives would coincide with the project's labour demand timelines to balance the immediate increase in competition for services and housing."
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4.2.3 Effects on the health, social, and economic conditions of Indigenous Peoples "Indigenous women... are expected to be at a disadvantage for participating in the workforce as they are most often primarily responsible for childcare."	Comments received during the assessment process noted that Indigenous women may experience disproportionate adverse effects associated with major resource development projects, including increased vulnerability to gender-based violence and barriers to workforce participation arising from caregiving and childcare responsibilities. Similar considerations may apply to procurement and business participation opportunities. Northern Ontario has a lower proportion of women-owned enterprises than Southern Ontario and Canada as a whole. These trends suggest that some groups may face structural barriers to accessing procurement opportunities associated with large-scale projects.	a) Condition 5.3 of the draft Potential Conditions adequately covers this concerns through the Training and Employment Plan, which includes conditions 5.3.4 and 5.3.5 as follows: 5.3.4 inform Indigenous Peoples of Designated Project-related employment and procurement opportunities, using targeted communication procedures designed in consultation with Indigenous groups; 5.3.5 consider procurement bids from qualified locally owned businesses, and give due consideration to bids submitted by businesses owned by Indigenous Peoples, Indigenous women owned companies, Indigenous members of the 2SLGBTQQIA+ community and Indigenous persons with disabilities. As such, FedNor recommends the inclusion of the Training and Employment Plan along with its items 5.3.4 and 5.3.5 in the final Impact Assessment report. b) FedNor could support women-owned small and medium-sized businesses through its funding	a) The draft Potential Conditions address the concern by requiring the project to actively share job and contracting opportunities with Indigenous communities, using communication approaches developed with them, and to fairly consider bids from local businesses, with particular attention to those owned by Indigenous people, including Indigenous women and other underrepresented groups. As such, FedNor recommends the inclusion of the Training and Employment Plan along with its items 5.3.4 and 5.3.5 in the final Impact Assessment report. b) In addition, FedNor could support women-owned small and medium-sized businesses through its funding programs, including the Regional Economic Growth through Innovation program and the Northern Ontario Development Program, and by working through intermediaries that help women entrepreneurs start and

	Without targeted measures, project-related procurement benefits may not be distributed equitably among local businesses. There is therefore an opportunity to strengthen outreach, capacity-building, and business support measures to help ensure women-owned, Indigenous-owned, and other underrepresented businesses are aware of and able to compete for project-related procurement opportunities.	programs, including the Regional Economic Growth through Innovation program and the Northern Ontario Development Program, and by working through intermediaries that help women entrepreneurs start and expand their businesses, as well as by supporting projects that strengthen key industries and contribute to regional economic growth.	expand their businesses, as well as by supporting projects that strengthen key industries and contribute to regional economic growth.
4.2.4 Positive impacts “The project would have a potential positive effect to the economic conditions of Indigenous peoples through increased employment, contracting and procurement opportunities, and community partnerships. The long-term benefits related to capacity building and skills development for Indigenous workers are expected to extend beyond the lifespan of the project”	The potential positive impacts of the project are accurately summarized and consistent with FedNor’s comments during the assessment process. The project’s potential economic benefits can have meaningful and lasting impacts on Indigenous and local communities, such as jobs, business opportunities, and training pathways, if the necessary supports are in place to ensure equitable access and effective implementation. This underscores the importance of targeted measures, including inclusive procurement practices, clear	FedNor’s Northern Ontario Development Program invests in projects led by municipalities, First Nations, and other organizations and institutions that support community economic development, diversification, job creation and self-reliant communities in Northern Ontario. It also supports businesses in key sectors to foster economic growth. FedNor programming could be leveraged by First Nation communities and local communities to build their capacity to directly respond to economic development opportunities related to contracting, procurement, and community partnerships. By investing in building the economic development capacity of municipalities and First Nations, communities will be better positioned to attract new business investment, create jobs and stimulate local economic growth.	FedNor funding could help First Nation and local communities build the skills and resources they need to take advantage of economic opportunities—like bidding on contracts, participating in procurement, and forming partnerships. Through the Northern Ontario Development Program, the federal government supports projects led by municipalities, First Nations, and other groups. These projects aim to strengthen local economies, create jobs, and help communities become more self-sufficient. By investing in economic development capacity (like planning, training, and infrastructure),

	communication of opportunities, and sustained investments in skills and capacity building, to translate short-term project activity into long-term community economic resilience.		communities are better able to attract new businesses and grow their local economies. FedNor's Northern Ontario Development Program also supports small and medium-sized businesses, including Indigenous businesses, to help drive economic growth and improve the competitiveness of businesses across Northern Ontario.
7.1.3 Uncertainties with Project Effects in Relation to Sustainability & Annex 3: Apitipi Anicinapek Nation's Assessment of impacts to the Nation's exercise of rights – AAN's Perspective on Uncertainty in Impact Assessments - Socioeconomics	As noted by Apitipi Anicinapek Nation, uncertainties created by the volatility in nickel prices and possible downturns could impact Indigenous Peoples with unrealized economic benefits (e.g. jobs, procurement), unstable employment, and limited long-term benefits while adverse federal effects on Indigenous Peoples would remain (e.g. traditional practices, well-being in towns), increasing social pressures and creating risks for the community. IAAC's recommended mitigation measures and follow-up program measures pertaining to changes to the health, social and economic conditions of Indigenous Peoples—page 85, Table 9 of	a) FedNor recommends that the Training and Employment Plan include measures to support the transition of Indigenous employees and contractors to alternative employment and procurement opportunities. These measures should apply in the event of temporary or permanent shutdowns for any reason, including price volatility or broader economic disruptions. Incorporating such measures would help extend the benefits of skills development, training, employment, and contracting beyond the life of the project by emphasizing transferable skills. This approach would support the long-term health, social, and economic well-being of Indigenous Peoples, independent of the project's future viability, while mitigating risks associated with unrealized economic benefits and ongoing adverse federal effects. Absent such measures, there is a risk that Indigenous communities may not fully realize anticipated economic benefits, such as employment and procurement opportunities. In	a) FedNor recommends that the Training and Employment Plan include steps to help Indigenous workers and businesses find new jobs or opportunities if the project slows down or shuts down. This means focusing on building skills that can be used beyond the project, so people are not left without work if things change. It would help protect the long-term economic and social well-being of Indigenous communities. FedNor believes this kind of planning is essential to make sure Indigenous Peoples—including women and businesses—can benefit from the project and move to other opportunities if needed.

	the Draft Impact Assessment Report—provides instructions for the proponent to develop, prior to construction and in consultation with Indigenous communities, Indigenous Services Canada and other relevant authorities, and implement during construction and operation, a Training and Employment Plan to increase project-related opportunities for Indigenous Peoples followed by a follow up program to verify the plan's effectiveness in providing opportunities for Indigenous Peoples to obtain skills and training, employment, procurement or contracting opportunities.	the event of a shutdown, this could leave communities worse off, particularly where reliance on the project was expected, while adverse federal effects persist. b) FedNor's Northern Ontario Development Program could be leveraged to support Indigenous and local communities in building the capacity needed to benefit from project-related economic opportunities or to diversify their economies. The program funds projects led by municipalities, First Nations, and other organizations that strengthen local economies, support job creation, and enhance community resilience. c) In the event of a temporary or permanent shutdown, Apitipi Anicinapek Nation could access FedNor's Northern Ontario Development Program to support community adjustment and economic diversification initiatives. Other First Nations and local communities could also benefit from this program.	Without these measures, there is a risk that communities may not fully benefit from the project and could be worse off if it ends or shuts down unexpectedly. b) FedNor also notes that its Northern Ontario Development Program can help communities build their capacity, diversify their economies, and create jobs—including supporting projects that help communities adapt and plan for economic change. c) If the project shuts down, Apitipi Anicinapek Nation could apply for FedNor funding through the Northern Ontario Development Program to help the community adjust and find new economic opportunities. Other First Nations and local communities could also benefit from this program.
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